

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

CHOKWE ANTAR LUMUMBA, et al.

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:16CV246-CWR-ASH

TATE REEVES, et al.

DEFENDANTS

**DEFENDANT RANKIN COUNTY, MISSISSIPPI'S  
MOTION TO DISMISS SECOND AMENDED COMPLAINT**

Defendant Rankin County, Mississippi (“Rankin County”) submits this Motion to Dismiss the Second Amended Complaint filed by Plaintiffs and in support shows as follows:

1. On June 17, 2024, Plaintiff filed their Second Amended Complaint, naming as Defendants Governor Tate Reeves and Lieutenant Governor Hosemann, in their official capacities, and Madison and Rankin Counties. Doc. 473.
2. Plaintiffs assert various claims, including a claim for injunctive relief against Rankin County. Doc. 473 at 35–36.
3. Today, July 1, 2024, Governor Tate Reeves and Lieutenant Governor Hosemann filed their motion to dismiss each remaining claim in this action. Doc. 475. For all of the reasons asserted in Governor Reeves’ and Lt. Governor Hosemann’s motion to dismiss, Doc. 475, and supporting memorandum brief, Doc. 476—which are incorporated by reference as if fully set forth herein—Rankin County requests the Court to dismiss the Plaintiffs’ Second Amended Complaint in full.

4. Due to the brief nature of this Motion, Rankin County respectfully requests the Court to waive the requirement of Uniform Local Rule 7(b)(4) that a separate memorandum of authorities be submitted with this Motion.

Dated: July 1, 2024.

Respectfully Submitted,

**RANKIN COUNTY, MISSISSIPPI**

BY: /s/ L. Kyle Williams  
One of its Attorneys

OF COUNSEL:

**BRUNINI, GRANTHAM, GROWER, & HEWES, PLLC**

William Trey Jones, III (MS Bar No. 99185)

L. Kyle Williams (MS Bar No. 105182)

190 East Capitol Street, Suite 100 (39201)

P.O. Drawer 119

Jackson, MS 39205-0119

Telephone: (601) 948-3101

Facsimile: (601) 960-6902

[tjones@brunini.com](mailto:tjones@brunini.com)

[kyle.williams@brunini.com](mailto:kyle.williams@brunini.com)

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document has been filed with the Clerk of this Court via the Court's electronic filing system and thereby electronically served all counsel of record as of this date.

Dated: July 1, 2024.

/s/ L. Kyle Williams

L. Kyle Williams